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*Attorneys for Defendants OWEN H. D'SOUZA ET AL.*

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

JTH Tax LLC, doing business as  
Liberty Tax Service

Plaintiff,

vs.

OWEN H. D'SOUZA; NORMA C.  
D'SOUZA; PICASSO TRIGGER  
COMPANY LLC,  
Defendants.

1:20-cv-00087-JAO-KJM  
(840 Trademark)

DEFENDANTS'  
SUPPLEMENTAL TRIAL BRIEF

Trial

Date: June 28, 2021  
Time: 8:30 a.m.  
Judge: Hon. Jill A. Otake

**DEFENDANTS' SUPPLEMENTAL TRIAL BRIEF**

COMES NOW, Defendants OWEN H. D'SOUZA, NORMA C.  
D'SOUZA, and PICASSO TRIGGER COMPANY LLC, by and through  
their attorneys, CAIN & HERREN, ALC, and pursuant to Paragraph 29 of  
the Rule 16 Scheduling Order, which was filed June 26, 2020, Dkt. 23,

Defendants' Trial Brief

JTH Tax LLC v. Owen H. D'Souza, et al.

1:20-cv-00087-JAO-KJM

submits the following supplemental trial brief.

**Choice of Law**

Defendants stipulate that Virginia law should apply to the franchise agreements.

Dated: Wailuku, Maui, Hawaii, Friday, June 18, 2021.

CAIN & HERREN, ALC



Michael J. Collins, Esq.

*Attorneys for Defendants Owen H. D'Souza,  
Norma C. Souza & Picasso Trigger  
Company LLC*

Defendants' Trial Brief  
JTH Tax LLC v. Owen H. D'Souza, et al.  
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